

On Thu, Sep 10, 2020 at 12:46 PM Erik Harris <eharris@ [REDACTED]> wrote:

Hey Hal-

My apologies. I'm finally getting a chance to catchup on emails.

Yes, Thursday the 17<sup>th</sup> will work for us. I will be on vacation, however, the other officers will be available.

Thanks,

Erik

--

**Erik Harris**

National Treasurer

Association of Professional Flight Attendants

[REDACTED]

*The content of this email is intended solely for the recipient(s).*

*It is not to be shared, forwarded or posted without the author's written consent.*



---

**From:** "oneil@ [REDACTED]" <oneil@ [REDACTED]>  
**Date:** Wednesday, September 9, 2020 at 3:46 PM  
**To:** Erik Harris <eharris@ [REDACTED]>  
**Cc:** Chris Thedford <cthedford@ [REDACTED]> Pam Bush <pbush@ [REDACTED]>  
**Subject:** Meeting next week?

2 CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

**Exhibit B-2**

**APP** [REDACTED]

Erik.....Last week I responded to your email regarding our review of the Bob Ross documents. Pam and I can come out to your office on Thursday morning the 17th to meet with you, Chris and hopefully Margot before we begin this process. I just want to make sure all of us are in agreement of what needs to be completed before Sept.24th. Will that morning work for you?

---

Hal O'Neil, CPA  
Wood, Stephens & O'Neil, L.L.P.



*Important/confidential: This communication and any files or documents attached to it are intended only for the use of the person(s) or entity to which it is addressed; consequently, it may contain information which is privileged and confidential. If you are not the intended recipient(s) of this communication, you are hereby notified that the copying, distribution or other use of this communication is strictly prohibited. If you have received this communication by mistake, please notify the sender immediately by electronic mail and destroy all forms of this communication (electronic or paper). Thank you.*

---

*Any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, by the recipient for the purpose of avoiding tax penalties that may be imposed or promoting, marketing or recommending to another party any transaction or tax-related matter(s).*

---

**From:** Heidi Kidwell <heidimorgan@ [REDACTED]>  
**Date:** May 7, 2022 at 8:06:36 AM EDT  
**To:** Nena Martin <nemarott@ [REDACTED]>, eharris@ [REDACTED]  
**Cc:** jhedrick@ [REDACTED], Nena Martin <nemarott@ [REDACTED]>  
**Subject:** RE: Dignity Files / Urgent Matter

Erik,

I was awakened yesterday morning to this unbelievable and frankly, unprecedented breach of Policy, Privacy and Constitution. Just when we think things can't get worse at APFA we find this.

You have provided an enormous amount of documents to the charging party that WERE NOT subpoenaed thereby violating Article II Section 3.C and 3.D whereby all members of the APFA shall have the right to individual privacy and the right to due process and equal representation.

While these UN-SUBPOENAED documents were provided you HAVE YET to fulfill our legally subpoenaed request which was followed up with you 4 times. The Arbitrator even demanded you fulfill it yet you and Margot Nikitas (likely guided by Bill Osbourne) have refused to send the documents we requested. To remind you again, item #2 on our subpoena was for :

1. Any and all internal APFA emails which distributed the communications between Hal O'Neil and APFA to the designated parties.

We demand you send those emails immediately. Once again APFA is showing preferential treatment to the charging party by not giving us equal representation.

You have violated OTHER members rights to individual privacy as well. Example.... Yvonne Johnson's paystub. Why on earth would this be included?

You have violated APFA's own Policy by distributing Nena Martin's HI1s. There is even HI1 included from BEFORE she became National VP. This action is completely contradictory to BOD Resolution 4 of 09MAR22 which added Policy Manual Section 1.F that states:

**F. ACCESS OF MEMBERS SCHEDULES**

1. During the normal course of business it may be necessary for a union representative to access a member's schedule utilizing admin access of Company provided programs. The practice of accessing a member's schedule using this access may only be used for assisting and representing a member.



We all know why this Policy Manual Section was created. There was a member in good standing wanting to view BOD HI1s. You and the other Officers took the position HI1s were proprietary and property of American Airlines. You refused numerous times to allow these to be accessed for any purpose other than representing a member. Yet Nena Martin's are not subpoenaed yet handed over on Digify? How do you rationalize this blatant violation of Policy that you, yourself demanded be followed?

And finally, the most unbelievable breach is providing W2 and 401K documents that include Nena Martin's SSN. This is not only violation of absolutely everything internally at APFA but also the Texas Business and Commerce Code and potentially Federal Law. We are discussing these issues with Legal Counsel. You provided this information to Members Melissa Chinery, Sandra Lee, Margot Nikitas and to me. These two members have proven they will stop at nothing to destroy an innocent person's life. As for Margot Nikitas she is either completely incompetent or doing the bidding of Hedrick/Osbourne. As for me, as Nena's friend and advocate I had absolutely no right to that information.

On a near daily basis Nena Martin is brutally harrassed by them and their moronic cronies on Facebook. There are even posts with regard to the postponement of the Arbitration (due to the death of the Arbitrator's mother) that prompted responses blaming Nena. Who is protecting Nena Martin's rights? While National Officers were fraternizing at Ms. Chinery's wedding we were just trying to get fair treatment.

We demand immediate response on ALL of these infractions. Your department has made it impossible for us to continue down the Article VII path where we feel there is even a modicum of fairness or equal representation. The is not just dirty but illegal.

I am disgusted to the core by all of you.

Heidi Morgan

Sent from Mail for Windows

---

**From:** Nena Martin  
**Sent:** Friday, May 6, 2022 8:36 PM  
**To:** eharris [REDACTED]  
**Cc:** jhedrick [REDACTED]; heidimorgan [REDACTED]; Nena Martin  
**Subject:** Digify Files / Urgent Matter

Erik,

On July 11, 2019 I became the recipient of a Facebook post in which the administration with which I served was lambasted and maligned based on information that the then APFA National Treasurer provided to two APFA Members.

The Facebook post stated that these two APFA Members were permitted to view "parts of the Bob Ross exit package", "financial records from the previous administration (the Ross administration)", "as well as a large series of checks all written to the 3 other previous national officers". The two APFA Members state, "any information we have shared here, we uncovered by rifling through stacks of papers".

By July 14, 2019 the "large series of checks all written to the 3 other previous national officers" had made their way to Facebook, along with confirmation from the sitting APFA



National Treasurer that financial documents containing our social security numbers, home addresses, 401K information, and tax information, had all been shared with these two APFA Members. Subsequently, this information was shared across multiple social media sites, although the APFA Policy Manual states that these records “are deemed confidential”.

After hundreds of emails between multiple parties, special Board of Director meetings, APFA “Special” hotlines, threatened lawsuits, hundreds of thousands of membership dues dollars spent on a public shaming and thirteen (13) sets of Article VII charges filed, four (4) against me alone, it saddens me to say that I find myself again in a situation that is far more egregious under your leadership, as the APFA National Treasurer than that in 2019.

On July 26, 2021, and again on April 13, 2022, you as the APFA National Treasurer, received a signed subpoena by Arbitrator Ruben Armendariz, to provide the following documents in the matter of Chinery/Lee vs Martin Article VII hearing.

- The weekly reports submitted by Nena Martin during her term in office from April 2016 to August 2018.
- The monthly expense form submitted by Nena Martin (including receipts) during her term in office from April 2016 to August 2018.
- The credit card statements, and all receipts, for national officers from April 2016 to August 2018.
- Monthly financials from April 2016 to August 2018.
- Petty Cash from April 2016 to August 2018.

Article I, Section 2.B. of the APFA Constitution states “To protect the individual and collective rights of the members of the APFA and to promote their professional interest and image”.

Article I, Section 2.H. of the APFA Constitution states “To disseminate information to enhance the professional status of the membership”.

Article II, Section 3.C. of the APFA Constitution states “All members of APFA shall have the right to individual privacy”.

Article II, Section 3.D. of the APFA Constitution states “All members of the APFA shall have the right to due process and equal representation”.

Article III, Section 6.E.(2). of the APFA Constitution states “The National Treasurer shall be responsible for all financial records of APFA”.

Article III, Section 6.E.(11) of the APFA Constitution states “The National Treasurer shall oversee and coordinate ongoing computerization of the APFA headquarters files, records and systems”.

Article III, Section 6.E.(12) of the APFA Constitution states “The National Treasurer shall oversee the daily activities of the APFA headquarters office staff”.



Article IV, Section 4.E. of the APFA Constitution states in part "An accountant shall be employed by the APFA and shall report directly to the National Treasurer. S/he shall keep an accurate record of all receipts and expenditures of the APFA"

After reviewing the uploaded documents in the "Digify" files last night, I'm quite sure all the above quoted sections of the APFA Constitution have been violated.

The violations discovered in "Digify" to my personal privacy and the confidential information uploaded are prolific. The negligence on the part of APFA, whether intentional or unintentional, to protect my personal information is incomprehensible.

After reviewing the signed subpoenas by Arbitrator Ruben Armendariz, can you explain to me why the below documents, outside of the subpoena request were provided and uploaded in to "Digify" for all parties to review, copy or post to social media?

- Weekly Activity Report / Pay Document
- Pay Transaction Detailed Entry Sheet
- **Pay Checks including Social Security Number, Bank Account, Date of Birth, Home Address**
- **End of Year 2015 Weekly, Monthly Report and HI1 as the STL Base President**
- Vacation, Payback, Deferral Request Form as the STL Base President
- Vacation Payout for all Officers of the Ross Administration
- Vacation/Sick Benefits Calculation Work Sheets
- Profit Sharing Transaction Work Sheet
- February 2017 Profit Sharing Communication between AA and APFA
- 2016 Profit Sharing Calculations for the Glading Administration
- 2016 Profit Sharing Calculations for the Ross Administration
- **Nena Martin W-2, Social Security Number and Home Address not redacted**
- **401K Participant Change Report containing Social Security Number, Home Address, Date of Birth and Email Address**
- UAL Retro Pay Calculation for all Officers of the Ross Administration
- Confidential Email Exchange between Jill Surdek and APFA / UAL Information
- Confidential Email Exchange between Jill Surdek and APFA / UAL Wage Table
- **Pay Increase Information**
- Triple Play Payouts for all Officers of the Ross Administration
- Grand Slam Payouts for all Officers of the Ross Administration
- Martin Transition Pay Work Sheet / VP to President
- **Yvonne Johnston Paycheck from AA / January 31, 2018**
- APFA Hotline / March 2, 2018
- 2017 W-2 Totals for all Officers of the Ross Administration
- 2017 Profit Sharing Calculations for the Ross Administration
- **Martin HI1 Schedule, Activity Sheet Detail from AA E-Pays / July 2018**
- **July, August and September 2018 Weekly, Monthly Report and HI1**
- Multiple A/P Transaction Processing File Load Sheets

I'm requesting at this time the Martin Weekly and Monthly Report files in "Digify" be removed immediately and the corrected information reloaded.

**The consequences from this breach of confidentiality, including, dealing with the ramifications of any and all financial damages, rest solely on APFA.**

I would like an update on this matter as soon as possible.

Nena Martin  
# 131799

---

**From:** ArticleVII <ArticleVII@apfa.org>  
**Sent:** Wednesday, October 12, 2022 7:15 AM  
**To:** Heidi Kidwell <heidimorgan65@gmail.com>; Nena Martin <nenarott@aol.com>  
**Subject:** Fwd: Martin Article VII Hearing; National Officer Witness Testimony Subpoenas

---

**From:** melchinery [REDACTED]  
**Sent:** Tuesday, October 11, 2022 11:08:22 PM  
**To:** sel27995 [REDACTED] sel27995@ [REDACTED] ArticleVII <ArticleVII@ [REDACTED]> National President  
<president [REDACTED]>  
**Subject:** Re: Martin Article VII Hearing; National Officer Witness Testimony Subpoenas

Josh,

Please send this to Arbitrator Armendariz.

Thank you

Melissa

Dear Arbitrator Armendariz

Mr Harris has indicated he is going to defy the subpoena and your email earlier today and not appear tomorrow morning. This is apparently on the advice of Ms Urban who apparently has little regard for an arbitrator's authority.

The financial records are the foundation of this hearing if APFA is unwilling to provide documents it is a clear indication of their lack of commitment to this process.

We are not able to commence our case until the financial records are entered. Again this is a slap in the face to all of the participants.

Sincerely,

Melissa Chinery-Burns  
Sandra Lee



On Tuesday, October 11, 2022 at 10:11:51 PM CDT, ArticleVII <[articlevii@apfa.org](mailto:articlevii@apfa.org)> wrote:

---

**From:** Alyssa Urban <AUrbani@apfa.org>  
**Sent:** Tuesday, October 11, 2022 18:32  
**To:** ArticleVII <ArticleVII@apfa.org>  
**Subject:** FW: Martin Article VII Hearing; National Officer Witness Testimony Subpoenas

Josh:

Please forward to Arbitrator Armendariz and the parties.

Arbitrator Armendariz:

Below you will find the email that I sent the parties yesterday on behalf of all of the National Officers regarding witness testimony for the Article VII hearing tomorrow and Thursday.


Erik Harris will be present tomorrow, but he is not available until 12:30pm. Mr. Harris has a new hire class of flight attendants coming in tomorrow morning where he will be presenting on behalf of APFA. The new hire presentations were scheduled well before this arbitration was reset for October and it cannot be rescheduled since the event is coordinated with American Airlines. Mr. Harris presumed this wouldn't be an issue because during the last few Article VII hearings, the parties always worked around the witnesses' schedules and this prior commitment only renders him unavailable for a brief period of the two-day hearing.

Apologies for the inconvenience. I will be there by 9am and we can make one of the other National Officers available to testify before 12pm if needed. Thank you.

Best,

**Alyssa Urban**  
*Staff Attorney*

**Association of Professional Flight Attendants**  
1004 W. Eulless Blvd.  
Eulless, Texas 76040



*The content of this email is intended solely for the recipient(s).  
It is not to be shared, forwarded or posted without the author's written consent*

---

**From:** Alyssa Urban  
**Sent:** Monday, October 10, 2022 3:06 PM

To: melchiner [REDACTED]; Sandra Lee <sel27995@[REDACTED]>; nenarott [REDACTED]; heidimorgan65 [REDACTED]

Subject: Martin Article VII Hearing; National Officer Witness Testimony Subpoenas

Good afternoon all:

I am reaching out to both parties regarding witness testimony subpoenas requested and issued for the October 12, 2022 and October 13, 2022 Martin Article VII Hearing. The Charging Parties have subpoenaed Treasurer Harris for testimony and the Charged Party has subpoenaed all four National Officers for testimony. However, given the nature of their positions, it is not feasible for all four National Officers to be sequestered at the hearing location for two days waiting to be called to testify. I will be at the hearing both days, and if the parties can inform me who they plan/need to call and an estimated time, I will notify the specific National Officer. The hearing location is only 7 minutes from APFA Headquarters so I do not anticipate this causing a delay, particularly if enough advance notice is provided.

Additionally, please note that Erik and Josh are only available to testify from 12:30pm - 5pm on Wednesday but both are available all day on Thursday. Julie and Larry are available any time on both days. Please do not infer any nefarious intent behind this email, I have simply emailed you directly because it is proper arbitration practice to seek mutual agreement amongst the parties before bringing a point of contention to the Arbitrator. However, in the event either party is opposed to this arrangement, I will reach out to Arbitrator Armendariz with this request.

Thank you for your time and attention to this matter.

Thank you.

Best,

**Alyssa Urban**

*Staff Attorney*

**Association of Professional Flight Attendants**

1004 W. Euless Blvd.

Euless, Texas 76040

Main: 817.540.0108 x8102

Direct: 682.301.8456

Email: [AUrban@\[REDACTED\]](mailto:AUrban@[REDACTED])

*The content of this email is intended solely for the recipient(s).*

*It is not to be shared, forwarded or posted without the author's written consent*



## Margot Nikitas

---

**From:** Erik Harris  
**Sent:** Wednesday, April 20, 2022 6:19 PM  
**To:** Margot Nikitas; Officers  
**Subject:** FW: Memo for the Board and EC  
**Attachments:** APFA - Board and EC memo.pdf; APFA - Vargas schedules A - C.pdf; APFA - Dunaway schedules A - C.pdf; APFA - Martin schedules A - C.pdf; APFA - Ross schedules A - C.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

--

**Erik Harris** *Pronouns: he, him, his*

National Treasurer

Association of Professional Flight Attendants

Office 817.540.0108x 8231 | Email [eharris@apfa.org](mailto:eharris@apfa.org)

*The content of this email is intended solely for the recipient(s).*

*It is not to be shared, forwarded or posted without the author's written consent.*



---

**From:** Hal O'Neil <oneil [REDACTED]>  
**Date:** Thursday, October 22, 2020 at 12:11 PM  
**To:** Erik Harris <eharris [REDACTED]>  
**Cc:** Pam Bush <pbush [REDACTED]>  
**Subject:** Memo for the Board and EC

Erik.....attached is the Board and EC Memo for your review. Also are the attached schedules for each officer. Please get back to me if this memo looks OK.

Thanks, Hal

---

Hal O'Neil, CPA  
Wood, Stephens & O'Neil, L.L.P.  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

*Important/confidential: This communication and any files or documents attached to it are intended only for the use of the person(s) or entity to which it is addressed; consequently, it may contain information which is privileged and confidential. If you are not the intended recipient(s) of this communication, you are hereby notified that the copying, distribution or other use of this communication is strictly prohibited. If you have received this communication by mistake, please notify the sender immediately by electronic mail and destroy all forms of this communication (electronic or paper). Thank you.*

---

*Any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, by the recipient for the purpose of avoiding tax penalties that may be imposed or promoting, marketing or recommending to another party any transaction or tax-related matter(s).*

---



**Wood, Stephens &  
O'Neil, L.L.P.**  
Certified Public Accountants



---

**CONFIDENTIAL MEMORANDUM**

MEMO TO: APFA Board of Directors and the Executive Committee

FROM: Hal O'Neil, CPA, Pam Bush

SUBJECT: Review of officer disbursements and the Bob Ross transition agreement

DATE: October 22, 2020

The current APFA officers, in consultation with the APFA staff attorney and outside counsel, requested that our firm review specific former officer expense reimbursements and payroll disbursements, as well as the payments arising from the Bob Ross confidential transition agreement. This informal engagement is substantially less in scope than an audit engagement, the objective of which would be the expression of an opinion regarding these specific disbursements. Accordingly, we do not express an opinion or any form of assurance regarding these disbursements. Our task under this informal engagement, was as follows:

1. To review the backup for the former officers' salary disbursement amounts from 2016 - 2018 and to determine these base salaries were calculated correctly and in compliance with the guidelines and pay rates stipulated in the APFA policy manual. Please see the enclosed schedule A for each officer.
2. To prepare an overpayment schedule of the accrued and unused sick, and accrued and unused vacation time payments made to Bob Ross in 2018, similar to the overpayment schedules we prepared previously for the other three officers. Please see the enclosed schedules B and C for each officer. These overpayment schedules for the other officers were previously provided to the Board of Directors. Please note the Bob Ross confidential transition agreement states that he will be paid all of his accrued and unused sick, and accrued and unused vacation time. This agreement doesn't specify that the payments be made in accordance with the policy manual guidelines. Consequently, these payments appear appropriate and in compliance with the transition agreement. This agreement also specifies reimbursement payments to him of up to \$10,000 in actual moving expenses. His moving expense reimbursement payments did not exceed this amount.
3. To assist the APFA accounting department staff in reviewing and organizing the various requested documents, as set forth in the flight attendants Chinery and Lee financial document request.

Please contact us should the Board of Directors or the Executive Committee have questions regarding our limited engagement.

Sincerely,

*Hal O'Neil, CPA*

A

**Marcy Dunaway - National Secretary Pay**

105 hours paid monthly at the highest purser pay including international override, per the policy manual.

* Maximum flight attendant pay	60.13		
Purser Pay	7.50		
International pay	3.75		
	<u>71.38</u>	105 hours	7,494.90

Bi-monthly pay 4/1/16 - 12/31/16	3,747.45
----------------------------------	----------

** Maximum flight attendant pay	61.33		
Purser Pay	7.50		
International pay	3.75		
	<u>72.58</u>	105 hours	7,620.90

Bi-monthly pay - 1/1/17 - 5/1/17	3,810.45
----------------------------------	----------

91,450.80	Annual salary
250.55	Daily rate for sick and vacation

*** Maximum flight attendant pay	64.96		
Purser Pay	7.50		
International pay	3.75		
	<u>76.21</u>	105 hours	8,002.05

Bi-monthly pay - 5/2/17 - 12/31/17	4,001.03
------------------------------------	----------

96,024.60	Annual salary
263.08	Daily rate for sick and vacation

**** Maximum flight attendant pay	66.26		
Purser Pay	7.50		
International pay	3.75		
	<u>77.51</u>	105 hours	8,138.55

Bi-monthly pay - 1/1/18 - 3/31/18	4,069.28
-----------------------------------	----------

97,662.60	Annual salary
267.57	Daily rate for sick and vacation

- \* Pay rates effective 4/1/16
- \*\* Pay rates effective 1/1/17 - 5/1/17
- \*\*\* Pay rates effective 5/2/17 - 12/31/17 (1.6% increase)
- \*\*\*\* Pay rates effective 1/1/18 - 3/31/18



				Case 4:22-cv-00343-Y Document 239-4 Filed 04/26/24 Page 15 of 41 PageID 6					
National Officer:		Marcy Dunaway							
				Annual	Daily amount	Eligible			
				Salary	(divide by 365)	Days to pay	Payment		
Profit Sharing - 2016									
						2,424.86		(paid 3/10/17)	
Vacation Pay - 2017									
				\$ 91,450.80	250.55	14	3,507.70	(paid 3/31/2017)	
Sick Pay - 2017									
				\$ 91,450.80	250.55	12	3,006.60	(paid 3/31/2017)	
Retro									
						831.60		(paid 6/1/17)	
Triple Grand Slam									
						300.00		(paid 7/6/17)	
Grand Slam									
						150.00		(paid 1/25/18)	
Profit Sharing - 2018									
						2,270.35		(paid 3/9/18)	
Vacation Pay - 2018									
				\$ 112,659.36	308.66	14	4,321.24	(paid 3/29/2018)	
Sick Pay - 2018									
				\$ 112,659.36	308.66	12	3,703.92	(paid 3/29/2018)	
Vacation Pay - 2017 - (adjustment paid in 2018)						513.10			
Sick Pay - 2017 - (adjustment paid in 2018)						439.80			
						952.90		(paid 3/29/2018)	
End of Term Payout - 2018									
				\$ 110,926.06	303.91	60	18,234.60	(paid 6/29/2018)	
Profit Sharing - 2018						1,199.47		(paid 3/8/19)	
						</			

				<b>C</b>						
<b>National Officer:</b>		<b>Marcy Dunaway</b>			<b>Overpayment Calculation</b>					
				Annual Salary	Daily amount (divide by 365)	Eligible Days to pay	Payment			
<b>Vacation Pay - 2018</b>										
	Original amount - paid in error (a)		\$	112,659.36	308.66	14	\$ 4,321.24	(paid 3/29/2018)		
	Correct calculation amount		\$	97,662.72	267.57	14	\$ 3,745.98			
						<b>Overpayment</b>	<b>\$ 575.26</b>	<b>\$ 575.26</b>		
<b>Sick Pay - 2018</b>										
	Original amount - paid in error (a)		\$	112,659.36	308.66	12	\$ 3,703.92	(paid 3/29/2018)		
	Correct calculation amount		\$	97,662.72	267.57	12	\$ 3,210.84			
						<b>Overpayment</b>	<b>\$ 493.08</b>	<b>\$ 493.08</b>		
<b>End of term payout - 2018</b>										
	Original amount - paid in error (a)		\$	110,926.06	303.91	60	\$ 18,234.60	(paid 6/29/2018)		
	Correct calculation amount		\$	97,662.60	267.57	60	\$ 16,054.20			
						<b>Overpayment</b>	<b>\$ 2,180.40</b>	<b>\$ 2,180.40</b>		
<b>Vacation Pay - 2017 - (adjustment paid in 2018....all paid in error)</b>						<b>Overpayment</b>	<b>\$ 513.10</b>	<b>\$ 513.10</b>	(paid 3/29/2018)	
<b>Sick Pay - 2017 - (adjustment paid in 2018....all paid in error)</b>						<b>Overpayment</b>	<b>\$ 439.80</b>	<b>\$ 439.80</b>	(paid 3/29/2018)	
						<b>Overpayment subtotal</b>	<b>\$ 4,201.64</b>	<b>**</b>		
	<b>Add 2018 profit-sharing contribution paid (3/8/2019) on excess amount above **</b>							<b>\$ 58.82</b>	(based on 1.4%)	
	<b>Total overpayment - due to APFA</b>							<b>\$ 4,260.46</b>		
(a) - included union pay (MEA/SAF)										

A

**Nena Martin - National Vice President Pay**  
**National President Pay (3/2/18)**

110.5 hours paid monthly at the highest purser pay including international override, per the policy manual.

* Maximum flight attendant pay	60.13		
Purser Pay	7.50		
International pay	3.75		
	<u>71.38</u>	110.5 hours	7,887.49

Bi-monthly pay 4/1/16 - 12/31/16	3,943.75
----------------------------------	----------

** Maximum flight attendant pay	61.33		
Purser Pay	7.50		
International pay	3.75		
	<u>72.58</u>	110.5 hours	8,020.09

Bi-monthly pay - 1/1/17 - 5/1/17	4,010.05
----------------------------------	----------

96,241.08	Annual salary
263.67	Daily rate for sick and vacation

*** Maximum flight attendant pay	64.96		
Purser Pay	7.50		
International pay	3.75		
	<u>76.21</u>	110.5 hours	8,421.21

Bi-monthly pay - 5/2/17 - 12/31/17	4,210.60
------------------------------------	----------

101,054.46	Annual salary
276.86	Daily rate for sick and vacation

**** Maximum flight attendant pay	66.26		
Purser Pay	7.50		
International pay	3.75		
	<u>77.51</u>	110.5 hours	8,564.86

Bi-monthly pay - 1/1/18 - 3/1/18	4,282.43
----------------------------------	----------

102,778.26	Annual salary
281.58	Daily rate for sick and vacation

Stepped in as President on 3/2/18

**** Maximum flight attendant pay	66.26		
Purser Pay	7.50		
International pay	3.75		
	<u>77.51</u>	116 hours	8,991.16

Bi-monthly pay - 3/2/18 - 3/31/18	4,495.58
-----------------------------------	----------

107,893.92	Annual salary
295.60	Daily rate for sick and vacation

- \* Pay rates effective 4/1/16
- \*\* Pay rates effective 1/1/17 - 5/1/17
- \*\*\* Pay rates effective 5/2/17 - 12/31/17 (1.6% increase)
- \*\*\*\* Pay rates effective 1/1/18 - 3/31/18



<b>National Officer:</b>		<b>Nena Martin</b>							
				Annual	Daily amount	Eligible			
				Salary	(divide by 365)	Days to pay	Payment		
<b>Profit Sharing - 2016</b>							2,541.90	(paid 3/10/17)	
<b>Vacation Pay - 2017</b>									
				\$	96,241.20	263.67	14	3,691.38	(paid 3/31/2017)
<b>Sick Pay - 2017</b>									
				\$	96,241.20	263.67	12	3,164.04	(paid 3/31/2017)
<b>Retro Pay</b>							875.16	(paid 6/1/17)	
<b>Triple Play Grand Slam</b>							300.00	(paid 7/6/17)	
<b>Grand Slam</b>							150.00	(paid 1/25/18)	
<b>Profit Sharing - 2017</b>							2,373.70	(paid 3/9/18)	
<b>Vacation Pay - 2018</b>									
				\$	131,844.90	361.22	14	5,057.08	(paid 3/29/2018)
<b>Sick Pay - 2018</b>									
				\$	131,844.90	361.22	12	4,334.64	(paid 3/29/2018)
<b>Vacation Pay - 2017 - (adjustment paid in 2018)</b>							520.94		
<b>Sick Pay - 2017 - (adjustment paid in 2018)</b>							439.80		
							960.74	(paid 3/29/18)	
<b>End of Term Payout - 2018</b>									
				\$	118,046.02	323.41	60	19,404.60	(paid 6/29/2018)
<b>Profit Sharing - 2018</b>							1,279.64	(paid 3/8/19)	

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

APPENDIX 102

				<b>C</b>						
<b>National Officer:</b>		<b>Nena Martin</b>		<b>Overpayment Calculation</b>						
				Annual Salary	Daily amount (divide by 365)	Eligible Days to pay	Payment			
<b>Vacation Pay - 2018</b>										
	Original amount - paid in error (a)		\$	131,844.90	361.22	14	\$ 5,057.08	(paid 3/29/2018)		
	Correct calculation amount		\$	101,510.74	278.11	14	\$ 3,893.54			
						<b>Overpayment</b>	<b>\$ 1,163.54</b>	<b>\$ 1,163.54</b>		
<b>Sick Pay - 2018</b>										
	Original amount - paid in error (a)		\$	131,844.90	361.22	12	\$ 4,334.64	(paid 3/29/2018)		
	Correct calculation amount		\$	101,510.74	278.11	12	\$ 3,337.32			
						<b>Overpayment</b>	<b>\$ 997.32</b>	<b>\$ 997.32</b>		
<b>End of term payout - 2018</b>										
	Original amount - paid in error (a)		\$	118,046.02	323.41	60	\$ 19,404.60	(paid 6/29/2018)		
	Correct calculation amount		\$	107,893.92	295.60	60	\$ 17,736.00			
						<b>Overpayment</b>	<b>\$ 1,668.60</b>	<b>\$ 1,668.60</b>		
<b>Vacation Pay - 2017 - (adjustment paid in 2018....all paid in error)</b>						<b>Overpayment</b>	<b>\$ 520.94</b>	<b>\$ 520.94</b>	(paid 3/29/2018)	
<b>Sick Pay - 2017 - (adjustment paid in 2018....all paid in error)</b>						<b>Overpayment</b>	<b>\$ 439.80</b>	<b>\$ 439.80</b>	(paid 3/29/2018)	
						<b>Overpayment subtotal</b>	<b>\$ 4,790.20</b>	<b>**</b>		
	<b>Add 2018 profit-sharing contribution paid (3/8/2019) on excess amount above **</b>						<b>\$ 67.06</b>	<b>(based on 1.4%)</b>		
				<b>Total overpayment - due to APFA</b>			<b>\$ 4,857.26</b>			
(a) - included union pay (MEA/SAF)										

A

**Bob Ross - National President Pay**

116 hours paid monthly at the highest purser pay including international override, per the policy manual.

* Maximum flight attendant pay	60.13		
Purser Pay	7.50		
International pay	3.75		
	<u>71.38</u>	116 hours	8,280.08

Bi-monthly pay 4/1/16 - 12/31/16	4,140.04
----------------------------------	----------

** Maximum flight attendant pay	61.33		
Purser Pay	7.50		
International pay	3.75		
	<u>72.58</u>	116 hours	8,419.28

Bi-monthly pay - 1/1/17 - 5/1/17	4,209.64
----------------------------------	----------

101,031.36	Annual salary
276.80	Daily rate for sick and vacation

*** Maximum flight attendant pay	64.96		
Purser Pay	7.50		
International pay	3.75		
	<u>76.21</u>	116 hours	8,840.36

Bi-monthly pay - 5/2/17 - 12/31/17	4,420.18
------------------------------------	----------

106,084.32	Annual salary
290.64	Daily rate for sick and vacation

**** Maximum flight attendant pay	66.26		
Purser Pay	7.50		
International pay	3.75		
	<u>77.51</u>	116 hours	8,991.16

Bi-monthly pay - 1/1/18 - 7/31/18	4,495.58
-----------------------------------	----------

107,893.92	Annual salary
295.60	Daily rate for sick and vacation

- \* Pay rates effective 4/1/16
- \*\* Pay rates effective 1/1/17 - 5/1/17
- \*\*\* Pay rates effective 5/2/17 - 12/31/17 (1.6% increase)
- \*\*\*\* Pay rates effective 1/1/18 - 7/31/18



<b>National Officer:</b>		<b>Bob Ross</b>																	
				Annual	Daily amount	Eligible													
				Salary	(divide by 365)	Days to pay	Payment												
<b>Profit Sharing - 2016</b>							2,652.22	(paid 3/10/17)											
<b>Vacation Pay - 2017</b>																			
				\$	101,031.36	276.80	14	3,875.20	(paid 3/31/17)										
<b>Sick Pay - 2017</b>																			
				\$	101,031.36	276.80	12	3,321.60	(paid 3/31/17)										
<b>Retro - Wage Arbitration Award 1.6%</b>							918.72	(paid 6/1/17)											
<b>Triple Play Grand Slam</b>							300.00	(paid 7/6/17)											
<b>Grand slam</b>							150.00	(paid 1/25/18)											
<b>(Additional \$50 grand slam paid on 2/15/18 salary check)</b>																			
<b>2017 Profit Sharing</b>							2,458.19	(paid 3/9/18)											
<b>Vacation &amp; Sick Pay - 2017 - (adjustment paid in 2018)</b>							968.76	(paid 3/29/2018)											
<b>Vacation Pay - 2017 (remaining unused days per agreement)</b>																			
				\$	114,632.67	314.06	17	5,339.02	(paid 3/29/2018)										
<b>Vacation Pay - 2018 (remaining unused days per agreement)</b>																			
				\$	122,121.70	334.58	29	9,702.82	(paid 3/29/2018)										
<b>(Paid in two checks in the amount of \$4,851.41 each)</b>																			
<b>Sick Pay - 2018</b>																			
				\$	122,121.69	334.58	12	4,014.96	(paid 3/29/2018)										
<b>End of Term Payout - 2017 (January 1 - December 31, 2017)</b>																			
				\$	118,046.02	334.58	35	11,710.30	(paid 3/29/2018)										
<b>(Paid in two checks in the amount of \$3,903.43 each and one for \$3,903.44)</b>																			
<b>End of Term Payout - 2018 (January 1 - July 31, 2018)</b>																			
				\$	118,046.02	334.58	20.44	6,838.82	(paid 3/29/2018)										
<b>(Paid in two checks in the amount of \$3,419.41 each)</b>																			
<b>Profit sharing 2018</b>							1,403.99	(paid 3/8/19)											

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER

APPENDIX 105

[illegible]

A

**Eugenio Vargas - National Treasurer Pay**

105 hours paid monthly at the highest purser pay including international override, per the policy manual.

*	Maximum flight attendant pay	60.13		
	Purser Pay	7.50		
	International pay	3.75		
		<u>71.38</u>	105 hours	7,494.90

Bi-monthly pay 4/1/16 - 12/31/16	3,747.45
----------------------------------	----------

**	Maximum flight attendant pay	61.33		
	Purser Pay	7.50		
	International pay	3.75		
		<u>72.58</u>	105 hours	7,620.90

Bi-monthly pay - 1/1/17 - 5/1/17	3,810.45
----------------------------------	----------

91,450.80	Annual salary
250.55	Daily rate for sick and vacation

***	Maximum flight attendant pay	64.96		
	Purser Pay	7.50		
	International pay	3.75		
		<u>76.21</u>	105 hours	8,002.05

Bi-monthly pay - 5/2/17 - 12/31/17	4,001.03
------------------------------------	----------

96,024.60	Annual salary
263.08	Daily rate for sick and vacation

****	Maximum flight attendant pay	66.26		
	Purser Pay	7.50		
	International pay	3.75		
		<u>77.51</u>	105 hours	8,138.55

Bi-monthly pay - 1/1/18 - 3/31/18	4,069.28
-----------------------------------	----------

97,662.60	Annual salary
267.57	Daily rate for sick and vacation

- \* Pay rates effective 4/1/16
- \*\* Pay rates effective 1/1/17 - 5/1/17
- \*\*\* Pay rates effective 5/2/17 - 12/31/17 (1.6% increase)
- \*\*\*\* Pay rates effective 1/1/18 - 3/31/18



**National Officer: Eugenio Vargas**

				Annual Salary	Daily amount (divide by 365)	Eligible Days to pay	Payment			
<b>Profit Sharing - 2016</b>							2,435.07	(paid 3/10/17)		
<b>Vacation Pay - 2017</b>										
				\$ 91,450.80	250.55	14	3,507.70	(paid 3/31/2017)		
<b>Sick Pay - 2017</b>										
				\$ 91,450.80	250.55	12	3,006.60	(paid 3/31/2017)		
<b>Retro</b>							831.60	(paid 6/1/17)		
							\$ 150.00	(paid 1/25/18)		
<b>Profit Sharing 2017</b>							2,269.76	(paid 3/9/18)		
<b>Vacation Pay - 2018</b>										
				\$ 113,021.02	309.65	14	4,335.10	(paid 3/29/2018)		
<b>Sick Pay - 2018</b>										
				\$ 113,021.02	309.65	12	3,715.80	(paid 3/29/2018)		
<b>Vacation Pay - 2017 - (adjustment paid in 2018)</b>							523.46			
<b>Sick Pay - 2017 - (adjustment paid in 2018)</b>							448.68			
							972.14	(paid 3/29/2018)		
<b>End of Term Payout - 2018</b>										
				\$ 111,317.70	304.98	54	16,468.92	(paid 6/29/2018)		
<b>Profit Sharing - 2018</b>							1,141.03	(paid 3/8/19)		

CONFIDENTIAL - SUBJECT TO PROTECTIVE ORDER  
APPENDIX 109

				<b>C</b>							
<b>National Officer:</b>		<b>Eugenio Vargas</b>			<b>Overpayment Calculation</b>						
				Annual Salary	Daily amount (divide by 365)	Eligible Days to pay	Payment				
<b>Vacation Pay - 2018</b>											
	Original amount - paid in error (a)		\$	113,021.02	309.65	14	\$ 4,335.10	(paid 3/29/2018)			
	Correct calculation amount		\$	97,662.72	267.57	14	\$ 3,745.98				
						<b>Overpayment</b>	<b>\$ 589.12</b>	<b>\$ 589.12</b>			
<b>Sick Pay - 2018</b>											
	Original amount - paid in error (a)		\$	113,021.02	309.65	12	\$ 3,715.80	(paid 3/29/2018)			
	Correct calculation amount		\$	97,662.72	267.57	12	\$ 3,210.84				
						<b>Overpayment</b>	<b>\$ 504.96</b>	<b>\$ 504.96</b>			
<b>End of term payout - 2018</b>											
	Original amount - paid in error (a)		\$	111,317.70	304.98	54	\$ 16,468.92	(paid 6/29/2018)			
	Correct calculation amount		\$	97,662.60	267.57	54	\$ 14,448.78				
						<b>Overpayment</b>	<b>\$ 2,020.14</b>	<b>\$ 2,020.14</b>			
<b>Vacation Pay - 2017 - (adjustment paid in 2018....all paid in error)</b>						<b>Overpayment</b>	<b>\$ 523.46</b>	<b>\$ 523.46</b>	(paid 3/29/2018)		
<b>Sick Pay - 2017 - (adjustment paid in 2018....all paid in error)</b>						<b>Overpayment</b>	<b>\$ 448.68</b>	<b>\$ 448.68</b>	(paid 3/29/2018)		
						<b>Overpayment subtotal</b>		<b>\$ 4,086.36</b>	<b>**</b>		
	<b>Add 2018 profit-sharing contribution paid (3/8/2019) on excess amount above **</b>							<b>\$ 57.21</b>	(based on 1.4%)		
				<b>Total overpayment - due to APFA</b>				<b>\$ 4,143.57</b>			
(a) - included union pay (MEA/SAF)											

From: Erik Harris <eharris@apfa.org> [Redacted by Plaintiff]  
Date: Thursday, October 22, 2020 at 12:14 PM  
To: Officers <Officers@apfa.org>  
Cc: Margot Nikitas <MNikitas@apfa.org>, Bill Osborne <BOSborne@osbornelaw.com>  
Subject: FW: Memo for the Board and EC

**Erik Harris**

National Treasurer

Association of Professional Flight Attendants

[Redacted by Plaintiff]

The content of this email is intended solely for the recipient(s).  
It is not to be shared, forwarded or posted without the author's written consent.



From: Hal O'Neil <oneil@woodcpafirm.com>  
Date: Thursday, October 22, 2020 at 12:11 PM  
To: Erik Harris <eharris@apfa.org>  
Cc: Pam Bush <pbush@woodcpafirm.com>  
Subject: Memo for the Board and EC

Erik.....attached is the Board and EC Memo for your review. Also are the attached schedules for each officer. Please get back to me if this memo looks OK.

Thanks, Hal

Hal O'Neil, CPA  
Wood, Stephens & O'Neil, L.L.P.  
6300 Ridglea Place, Suite #318  
Fort Worth, TX 76116

Direct line - 817- [Redacted by Plaintiff]  
Firm tele. - 817- [Redacted by Plaintiff] (my extension #601)  
Firm fax - 817- [Redacted by Plaintiff]

*Important/confidential: This communication and any files or documents attached to it are intended only for the use of the person(s) or entity to which it is addressed; consequently, it may contain information which is privileged and confidential. If you are not the intended recipient(s) of this communication, you are hereby notified that the copying, distribution or other use of this communication is strictly prohibited. If you have received this communication by mistake, please notify the sender immediately by electronic mail and destroy all forms of this communication (electronic or paper). Thank you.*

*Any tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, by the recipient for the purpose of avoiding tax penalties that may be imposed or promoting, marketing or recommending to another party any transaction or tax-related matter(s).*

Attachments:

APFA - Board and EC memo.pdf	79.7 KB
APFA - Vargas schedules A - C.pdf	112 KB
APFA - Dunaway schedules A - C.pdf	112 KB
APFA - Martin schedules A - C.pdf	113 KB
APFA - Ross schedules A - C.pdf	137 KB



**Wood, Stephens &  
O'Neil, L.L.P.**  
Certified Public Accountants

6300 Ridglea Place, Suite 318  
Fort Worth, TX 76116  
Tele. 817-377-1700  
Fax 817-377-1870

**CONFIDENTIAL MEMORANDUM**

MEMO TO: APFA Board of Directors and the Executive Committee

FROM: Hal O'Neil, CPA, Pam Bush

SUBJECT: Review of officer disbursements and the Bob Ross transition agreement

DATE: October 22, 2020

The current APFA officers, in consultation with the APFA staff attorney and outside counsel, requested that our firm review specific former officer expense reimbursements and payroll disbursements, as well as the payments arising from the Bob Ross confidential transition agreement. This informal engagement is substantially less in scope than an audit engagement, the objective of which would be the expression of an opinion regarding these specific disbursements. Accordingly, we do not express an opinion or any form of assurance regarding these disbursements. Our task under this informal engagement, was as follows:

1. To review the backup for the former officers' salary disbursement amounts from 2016 - 2018 and to determine these base salaries were calculated correctly and in compliance with the guidelines and pay rates stipulated in the APFA policy manual. Please see the enclosed schedule A for each officer.
2. To prepare an overpayment schedule of the accrued and unused sick, and accrued and unused vacation time payments made to Bob Ross in 2018, similar to the overpayment schedules we prepared previously for the other three officers. Please see the enclosed schedules B and C for each officer. These overpayment schedules for the other officers were previously provided to the Board of Directors. Please note the Bob Ross confidential transition agreement states that he will be paid all of his accrued and unused sick, and accrued and unused vacation time. This agreement doesn't specify that the payments be made in accordance with the policy manual guidelines. Consequently, these payments appear appropriate and in compliance with the transition agreement. This agreement also specifies reimbursement payments to him of up to \$10,000 in actual moving expenses. His moving expense reimbursement payments did not exceed this amount.
3. To assist the APFA accounting department staff in reviewing and organizing the various requested documents, as set forth in the flight attendants Chinery and Lee financial document request.

Please contact us should the Board of Directors or the Executive Committee have questions regarding our limited engagement.

Sincerely,

*Hal O'Neil, CPA*

A

**Eugenio Vargas - National Treasurer Pay**

105 hours paid monthly at the highest purser pay including international override, per the policy manual.

*	Maximum flight attendant pay	60.13		
	Purser Pay	7.50		
	International pay	3.75		
		71.38	105 hours	7,494.90

Bi-monthly pay 4/1/16 - 12/31/16	3,747.45
----------------------------------	----------

**	Maximum flight attendant pay	61.33		
	Purser Pay	7.50		
	International pay	3.75		
		72.58	105 hours	7,620.90

Bi-monthly pay - 1/1/17 - 5/1/17	3,810.45
----------------------------------	----------

91,450.80	Annual salary
250.55	Daily rate for sick and vacation

***	Maximum flight attendant pay	64.96		
	Purser Pay	7.50		
	International pay	3.75		
		76.21	105 hours	8,002.05

Bi-monthly pay - 5/2/17 - 12/31/17	4,001.03
------------------------------------	----------

96,024.60	Annual salary
263.08	Daily rate for sick and vacation

****	Maximum flight attendant pay	66.26		
	Purser Pay	7.50		
	International pay	3.75		
		77.51	105 hours	8,138.55

Bi-monthly pay - 1/1/18 - 3/31/18	4,069.28
-----------------------------------	----------

97,662.60	Annual salary
267.57	Daily rate for sick and vacation

- \* Pay rates effective 4/1/16
- \*\* Pay rates effective 1/1/17 - 5/1/17
- \*\*\* Pay rates effective 5/2/17 - 12/31/17 (1.6% increase)
- \*\*\*\* Pay rates effective 1/1/18 - 3/31/18

				B							
National Officer:		Eugenio Vargas									
		Annual Salary		Daily amount (divide by 365)		Eligible Days to pay		Payment			
Profit Sharing - 2016								2,435.07		(paid 3/10/17)	
Vacation Pay - 2017											
		\$ 91,450.80		250.55		14		3,507.70		(paid 3/31/2017)	
Sick Pay - 2017											
		\$ 91,450.80		250.55		12		3,006.60		(paid 3/31/2017)	
Retro								831.60		(paid 6/1/17)	
								\$ 150.00		(paid 1/25/18)	
Profit Sharing 2017								2,269.76		(paid 3/9/18)	
Vacation Pay - 2018											
		\$ 113,021.02		309.65		14		4,335.10		(paid 3/29/2018)	
Sick Pay - 2018											
		\$ 113,021.02		309.65		12		3,715.80		(paid 3/29/2018)	
Vacation Pay - 2017 - (adjustment paid in 2018)								523.46			
Sick Pay - 2017 - (adjustment paid in 2018)								448.68			
								972.14		(paid 3/29/2018)	
End of Term Payout - 2018											
		\$ 111,317.70		304.98		54		16,468.92		(paid 6/29/2018)	
Profit Sharing - 2018								1,141.03		(paid 3/8/19)	

[illegible]

**APFA 73**

## APPENDIX 204

A

**Marcy Dunaway - National Secretary Pay**

105 hours paid monthly at the highest purser pay including international override, per the policy manual.

* Maximum flight attendant pay	60.13		
Purser Pay	7.50		
International pay	3.75		
	<u>71.38</u>	105 hours	7,494.90

Bi-monthly pay 4/1/16 - 12/31/16	3,747.45
----------------------------------	----------

** Maximum flight attendant pay	61.33		
Purser Pay	7.50		
International pay	3.75		
	<u>72.58</u>	105 hours	7,620.90

Bi-monthly pay - 1/1/17 - 5/1/17	3,810.45
----------------------------------	----------

91,450.80	Annual salary
250.55	Daily rate for sick and vacation

*** Maximum flight attendant pay	64.96		
Purser Pay	7.50		
International pay	3.75		
	<u>76.21</u>	105 hours	8,002.05

Bi-monthly pay - 5/2/17 - 12/31/17	4,001.03
------------------------------------	----------

96,024.60	Annual salary
263.08	Daily rate for sick and vacation

**** Maximum flight attendant pay	66.26		
Purser Pay	7.50		
International pay	3.75		
	<u>77.51</u>	105 hours	8,138.55

Bi-monthly pay - 1/1/18 - 3/31/18	4,069.28
-----------------------------------	----------

97,662.60	Annual salary
267.57	Daily rate for sick and vacation

- \* Pay rates effective 4/1/16
- \*\* Pay rates effective 1/1/17 - 5/1/17
- \*\*\* Pay rates effective 5/2/17 - 12/31/17 (1.6% increase)
- \*\*\*\* Pay rates effective 1/1/18 - 3/31/18



				B					
National Officer:		Marcy Dunaway							
		Annual Salary	Daily amount (divide by 365)	Eligible Days to pay	Payment				
Profit Sharing - 2016						2,424.86		(paid 3/10/17)	
Vacation Pay - 2017									
		\$ 91,450.80	250.55	14	3,507.70	(paid 3/31/2017)			
Sick Pay - 2017									
		\$ 91,450.80	250.55	12	3,006.60	(paid 3/31/2017)			
Retro						831.60		(paid 6/1/17)	
Triple Grand Slam						300.00		(paid 7/6/17)	
Grand Slam						150.00		(paid 1/25/18)	
Profit Sharing - 2018						2,270.35		(paid 3/9/18)	
Vacation Pay - 2018									
		\$ 112,659.36	308.66	14	4,321.24	(paid 3/29/2018)			
Sick Pay - 2018									
		\$ 112,659.36	308.66	12	3,703.92	(paid 3/29/2018)			
Vacation Pay - 2017 - (adjustment paid in 2018)						513.10			
Sick Pay - 2017 - (adjustment paid in 2018)						439.80			
						952.90		(paid 3/29/2018)	
End of Term Payout - 2018									
		\$ 110,926.06	303.91	60	18,234.60	(paid 6/29/2018)			
Profit Sharing - 2018						1,199.47		(paid 3/8/19)	

C

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

A

**Nena Martin - National Vice President Pay**  
**National President Pay (3/2/18)**

110.5 hours paid monthly at the highest purser pay including international override, per the policy manual.

* Maximum flight attendant pay	60.13		
Purser Pay	7.50		
International pay	3.75		
	71.38	110.5 hours	7,887.49

Bi-monthly pay 4/1/16 - 12/31/16	3,943.75
----------------------------------	----------

** Maximum flight attendant pay	61.33		
Purser Pay	7.50		
International pay	3.75		
	72.58	110.5 hours	8,020.09

Bi-monthly pay - 1/1/17 - 5/1/17	4,010.05
----------------------------------	----------

96,241.08	Annual salary
263.67	Daily rate for sick and vacation

*** Maximum flight attendant pay	64.96		
Purser Pay	7.50		
International pay	3.75		
	76.21	110.5 hours	8,421.21

Bi-monthly pay - 5/2/17 - 12/31/17	4,210.60
------------------------------------	----------

101,054.46	Annual salary
276.86	Daily rate for sick and vacation

**** Maximum flight attendant pay	66.26		
Purser Pay	7.50		
International pay	3.75		
	77.51	110.5 hours	8,564.86

Bi-monthly pay - 1/1/18 - 3/1/18	4,282.43
----------------------------------	----------

102,778.26	Annual salary
281.58	Daily rate for sick and vacation

**Stepped In as President on 3/2/18**

**** Maximum flight attendant pay	66.26		
Purser Pay	7.50		
International pay	3.75		
	77.51	116 hours	8,991.16

Bi-monthly pay - 3/2/18 - 3/31/18	4,495.58
-----------------------------------	----------

107,893.92	Annual salary
295.60	Daily rate for sick and vacation

- \* Pay rates effective 4/1/16
- \*\* Pay rates effective 1/1/17 - 5/1/17
- \*\*\* Pay rates effective 5/2/17 - 12/31/17 (1.6% increase)
- \*\*\*\* Pay rates effective 1/1/18 - 3/31/18

**APFA 77**

**APPENDIX 208**

[illegible]

[illegible]**APFA 79**

## APPENDIX 210



A

**Bob Ross - National President Pay**

116 hours paid monthly at the highest purser pay Including international override, per the policy manual.

* Maximum flight attendant pay	60.13		
Purser Pay	7.50		
International pay	3.75		
	<u>71.38</u>	116 hours	8,280.08

Bi-monthly pay 4/1/16 - 12/31/16	4,140.04
----------------------------------	----------

** Maximum flight attendant pay	61.33		
Purser Pay	7.50		
International pay	3.75		
	<u>72.58</u>	116 hours	8,419.28

Bi-monthly pay - 1/1/17 - 5/1/17	4,209.64
----------------------------------	----------

101,031.36	Annual salary
276.80	Daily rate for sick and vacation

*** Maximum flight attendant pay	64.96		
Purser Pay	7.50		
International pay	3.75		
	<u>76.21</u>	116 hours	8,840.36

Bi-monthly pay - 5/2/17 - 12/31/17	4,420.18
------------------------------------	----------

106,084.32	Annual salary
290.64	Daily rate for sick and vacation

**** Maximum flight attendant pay	66.26		
Purser Pay	7.50		
International pay	3.75		
	<u>77.51</u>	116 hours	8,991.16

Bi-monthly pay - 1/1/18 - 7/31/18	4,495.58
-----------------------------------	----------

107,893.92	Annual salary
295.60	Daily rate for sick and vacation

- \* Pay rates effective 4/1/16
- \*\* Pay rates effective 1/1/17 - 5/1/17
- \*\*\* Pay rates effective 5/2/17 - 12/31/17 (1.6% increase)
- \*\*\*\* Pay rates effective 1/1/18 - 7/31/18

**APFA 80****APPENDIX 211**

																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					</
--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	----

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

## APFA 82

## APPENDIX 213

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FT. WORTH DIVISION

ROBERT “BOB” ROSS  
Plaintiff/Counterclaim Defendant

Case No. 4:22-CV-00343-Y

ASSOCIATION OF  
PROFESSIONAL FLIGHT  
ATTENDANTS, MCGAUGHEY,  
REBER AND ASSOCIATES,  
INC., JULIE HEDRICK, ERIK  
HARRIS  
Defendants/Counterclaim Plaintiff.

EUGENIO VARGAS  
Plaintiff/Counterclaim Defendant

Case No. 4:22-CV-00430-Y

ASSOCIATION OF  
PROFESSIONAL FLIGHT  
ATTENDANTS, JULIE HEDRICK,  
ERIK HARRIS  
Defendants/Counterclaim Plaintiff.

AFFIDAVIT OF CRAIG GUNTER

BEFORE ME, the undersigned authority, on this day personally appeared Craig Gunter, who being by me first duly sworn, did state:

1. “I am employed with American Airlines, Inc. as a flight attendant since the merger with US Airways in 2013. I was hired by US Airways, Inc. in 1988. I served as the Association of Professional Flight Attendants (“APFA”) National Treasurer and as a Board member on the APFA Board of Directors from July 2, 2018 – March 31,

2020. I am a member in good standing with the APFA. I am of sound mind and body to make this affidavit and have personal knowledge of the following facts:

- a. During 2018, while I served as APFA National Treasurer and served on the Board of Directors, the APFA discovered payments made to former National Officers Eugenio Vargas, Nena Martin, and Marcy Dunaway for accrued and unused sick and vacation end-of-term payouts that were miscalculated. APFA Board of Directors threatened to take legal action against Eugenio Vargas, Nena Martin, and Marcy Dunaway (the “Officers”). However, at the direction of Counsel, the APFA Board of Directors offered to release Eugenio Vargas, Nena Martin, and Marcy Dunaway from all claims provided the Officers repaid the outstanding amount owed to APFA in full or signed a promissory note to complete a payment plan for the outstanding amounts owed to APFA in full.
- b. Eugenio Vargas signed a promissory note in the amount of \$4,143.57.
- c. Nena Martin paid the outstanding amount owed to APFA in full.
- d. My involvement with Robert “Bob” Ross’s (“Ross”) Confidential Transition Agreement was limited due the confidentiality clause in the document. The only payments for which I approved were those for moving expenses made in 2019. Receipts were submitted to me by Mr. Ross, and I submitted those receipts to APFA Counsel for review and approval. If approved, I was directed to initiate payments of a particular amount by APFA Counsel to Ross provided it was in compliance with the Ross Transition Agreement. No overpayment determination was calculated for the Ross Transition Agreement while I served as APFA National Treasurer because the 2018 APFA Board of Directors